(6)

Supreme Court, U.S.
FILED

01 297 AUG 10 2001

OFFICE OF THE CLERK

NO

IN THE SUPREME COURT OF THE
UNITED STATES
October term 2000

EUGENE JONESON-PETITIONER
VS.
THE PEOPLE OF THE STATE OF
ILLINOIS

IN THE INTEREST OF LUELLA JONESON

On Petition For Writ of Certiorari to the United States Court For the 1st District of Illinois

PETITION FOR WRIT OF CERTIORARI OF EUGENE HERMAN JONESON

APPENDIX L

Eugene Joneson
Pro Se
11732 S. Prairie
Chicago, Illinois 60628
773-568 -4132

31 pp

State of Illinois
County of Cook

In The Circuit Court of Cook County, Illinois
... Department of Juvenile Justice and Child Protection
Child Protection Division

In The Interest Of	)	No. 94JA 1107
Luella Joneson	)	
	)	Filed
Minor	)	98 March 26 PM 12;58
		Circuit Court of Cook
		County, Il
		Aurellia Pucinski,Clerk

Motion To Withdraw As Attorney of Record

Now comes, Petitioner, Attorney Wilson, and moves this Honorable Court to withdraw as attorney of record in the above captioned matter as follows:

1. That Petitioner is the attorney of record in the above captioned matter, which is presently pending and undisposed of before this Honorable Court.

2. That petitioner represents the Father, Eugene Joneson in this pending matter.

3. That irreconcilable differences have arisen between Petitioner and Father, Eugene Joneson, which now makes it impossible for counsel to meaningfully communicate with her client.

4. That all attempts to reconcile this matter have failed, and counsel believes it is in her best interest to withdraw as attorney of record, instanter.

5. That proper notice has been provided to all parties in this matter including Eugene Joneson at his last known address provided, by certified mail.

6. That it would be in the best interest of Eugene Joneson, that his Honorable Court allow him 21 days to retain new counsel in this pending matter.

Wherefore, Petitioner prays as follows:

1. That Petitioner be granted leave to withdraw as attorney of record in this matter instanter.

Registered
March 26, 1998
Aurellia Pucinski
Clerk of The Circuit Court

C25

State of Illinois
County of Cook
In The Circuit Court of Cook County, Illinois
. . . Department of Juvenile Justice and Child Protection
Child Protection Division

In Re The Petition of	)	No. 94JA 1107
Adjudication of Wardship of	)	
Luella Joneson	)	Filed
Minor	)	98 Apr-2 PM 2;39
		Circuit Court of Cook
		County, Il
		Juvenile Division
		Aurellia Pucinski, Clerk

Notice of Motion

To:

On 4/7, 1998 at 9:00 A.M., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Mulhern, or any judge sitting in her stead, in calendar number 4k in the Juvenile Court Building, 2245 West Ogden, Chicago, Il. 60612, or the courthouse located at 1100 S. Hamilton and present the attached pleading requesting: Motion to Dismiss Best Interests Hearing Attorney Signature "s/g Eugene Joneson , Pro Se, 2043 W. Dickens, Chicago, Illinois 60647, 773-645-9695.

RECEIVED APRIL 2ND 1998

C27

Motion to Dismiss Best Interest Hearing
(1) Notice of Appeal will be filed
(2.) Discovery includes recalling of witnesses not thoroughly evaluated during unfitness. Theses include:

(1) Laura Scott- caseworker for almost 1st year for Luella

(2) Willa Henning Intake worker

(3)Doris Abrew- LCSW from Public Defender's office

(4)Minna Greene- Salvation Army

(5) Kathy Pesek- Child Development

(6)Laura Miller- psychiatrist report

(7) Amy Anson - child psychologist

(8) Greg Dell- Pastor of Mr. Joneson and Luella

(9) The VillaNuevas- Foster Parents

(3) Evidence- (1) Birth cert. (2) Hospital Receipts (3) Prenatal notes(4) No abuse or neglect found against father (5) Letter to

C28

Willa Henning asking for help (6) brought in care due to risk of harm due t mental illness of parents. (7) No longer is mental illness and issue for kids (8)parenting skills. Examples given for minimum skills are wether here say or contradicting actual practice in profession

(3) If appeal is reversed the extra cost an time of court, state and father will be wasted.

C29

Summons To Appear For Jury Service

By Order of the Circuit Court of Cook County of Illinois
You are hereby summoned to appear for Jury Service at:
J. Daley enter 50 W. Washington ST. Room 1700 Chicago Il 60602

Juror Number	Service Date	Time
70636835 1 79	Tuesday April 07 98 1	9:00 AM

Dell Gregory 4989
3344 N Broadway St.
Chicago, Il 60657-3520

C30

BROADWAY UNITED METHODIST CHURCH

3344 North Broadway Telephone 773-348-2879
Chicago, Illinois 60657-3520 Fax 773-348-2521

March 20, 1998

To Whom It May Concern:

Please receive this as a verification that I am unable to appear in court on April 7 to testify in the case relating to the concerns of Mr. Eugene Joneson. My inability to be present is due to my summons for jury duty on that day(photocopy attached)

Sincerely
"s/g Gregory Dell"
Gregory Dell, Pastor

C 031

Appellate Record (Vol 1 of 2 1/8/99 C71-72)
Copyright 1997, Chicago Tribune
Headline: STATE EXPERIMENTS WITH HMO_STYLE FOSTER CARE FOES FEAR THAT KIDS WILL GET SHORT SHRIFT
Date: Monday September 15,1997 Section: news
Edition : North Sports Final
Length: Long 1483 Words
Author: Judy Peres Tribune Staff Writer
Text:
In a radical effort to downsize the bloated foster care system while improving the lot of its young wards the Illinois Department of Children and Family Services this summer has brought managed care to child welfare.

Not surprisingly, much of the debate over the promised virtues and feared pitfalls of managed care has come along as well. Designers of The DCFS plan say it will more than double the number of abused and neglected children placed in permanent homes but some experts worry wether such huge expectations will encourage contracting to sacrifice- service for dollars. Just a couple of months the experiment, it remains too early to know.

....Now, like a health maintenance organization dealing with physicians, the department pays providers of foster care services a flat fee based on a predetermined number of cases.

So if an agencies caseload increases, it absorbs the additional cost. But if the agency manages to reduce its caseload or provide fewer services, it can pocket the profit.

According to Joe Loftus, DCFS executive deputy director, and other department officials, the plan provides a financial incentive to move children into permanent living arrangements. The old fee-for- service system, on the other hand,

paid agencies to keep children in foster care— and, they said, contributed to the huge buildup of children in the system.

Despite the changes, however, Loftus emphasized that child safety remains a top priority.

And he stressed that this is not a return to the old k" family preservation" ideology, which encourages reunification with the child's natural parents out of "blind faith" that reunification was best. Loftus said the new system promotes adoption and subsidized guardianship, as well as family preservation.

" This is a way of doing the right thing for kids and families, " he said.

But many providers of foster care services, while applauding the plan's goals, fear the reform could put more children in jeopardy. And Cook County Public Guardian Patrick Murphy says the managed- care approach could be "devastating."

"The good agencies will behave responsibly, even when they have to take a hit to provide appropriate services, " Murphy said, "But the bad ones— and they've been coming out of the woodwork lately— will get rid of their kids and keep the money."

Although many states are experimenting with managed care in the area of child protection, no two plans are alike.

The program in Illinois, called "performance-based contracting went into effect July 1 in Cook County. So far, it applies only to children in the foster care of relatives whose cases are managed by private agencies— about 19,000.

But DCFS hopes to expand it soon to those in ono-relative and specialized care, and to the rest of the state.

DCFS oversees more than 50,000 children who have been removed from the custody of their natural parents, about 28,000 of them in the care of relatives and another 19,000 in

non-relative foster care. About 70 percent are managed by private agencies.

The U.S. Department of Health and Human Services says Illinois has the nation's worst record for keeping kids in foster care. 40 percent longer than New York and nearly twice as long as California, Loftus and Mark Testa, director of research for DCFS, said the department's caseload has stabilized in the last two years—but it remains 30 percent to 40 percent higher than it should be.

Among the causes for that, officials said are the incentive structure of the old system and the fear of caseworkers and courts to make a mistake. There have been several notorious cases in recent years in which children returned to natural parents ended up dead--including, Joseph Wallace, whose mother hanged him in 1993, and Frank Torres, whose parents were charged with his murder last month.

Enter performance contracting, which is designed to overcome the system's. imperfections by aligning incentives with the outcomes that are best for children.

According to a May report on the initiative, contracting will be paid for " outcomes, not activities" A positive outcome is defined as a permanent placement: reunification with natural parents, adoption or subsidized guardianship.

C72

State of Illinois
County of Cook

In The Circuit Court of Cook County, Illinois
. . . Department of Juvenile Justice and Child Protection
Child Protection Division

In the Interest of) No. 94JA 1107
Luella Joneson)
Minor)

Notice To Parents and Children of Shelter Care Hearing

Mother: Frances O'Neill
Address: 900 W. Argyle # 303
Chicago, Il 60640

Father: Eugene Joneson Gal: Patrick Murphy
Address: Same as above

On 2/14, 1994, at 9;30 A.M. before the Honorable_____
(address: 110 S. Hamilton, Chgo.Il. 60612Please ask at front desk
_____ The State of Illinois will present evidence (1) that (name of child or children:) see above are abused for the following reasons: risk of harm and (2) that there is immediate and urgent necessity" to remove the child or children from the responsible relative YOUR FAILURE TO APPEAR AT THE HEARING MAY RESULT IN PLACEMENT OF THE CHILD OR CHILDREN IN FOSTER CARE UNTIL A TRIAL CAN BE HELD . a TRIAL MAY NOT BE HELD FOR UP TO 90 DAYS.

C73

State of Illinois
County of Cook
In The Circuit Court of Cook County, Illinois
. . . Department of Juvenile Justice and Child Protection
Child Protection Division

In The Interest of	)	No. 94JA 1107
Luella Joneson	)	Filed
Minor	)	Feb 22, 1994
		Aurellia Pucinski,
		Clerk Circuit Court of Cook

Temporary Custody Hearing Order

(Chap. 37, Para. 802-7)

This cause coming to be heard upon the Motion of State for TC The courts having jurisdiction over the matter and parties, and being fully advised in the premises:

The Court Finds:

1. The minor's
Mother received 7101 notice and was not 7202 present
Father received 7103 notice and was 7104 present
2. Probable cause
7100 B. the basis of the finding is: The parents of this minor are mentally ill & unable to care for this minor.
3. Immediate and urgent necessity
7107 B. does exist to support removal of the minor from home: or the basis of this finding is : Same as above
4. Reasonable efforts: 7108 B. cannot, at this time, for good causes . prevent or eliminate the necessity to remove the child from the home The basis of this finding is same as above.

C74

ORDER OF THE APPELLATE COURT FOR OLDER SIBLING SISTERS OF L. J INDICATING LACK OF REASONABLE PROGRESS DUE LARGELY TO CHRONIC PERSONALITY DISORDER

Thus, in the face of this clear and convincing evidence of respondent's lack of reasonable progress toward reunification, due in large measure to his own chronic personality disorder, we find that the court's dismissal of the supplemental petitions was against the manifest weight of the evidence, and we reverse that judgment. L.L.S., 218 Ill. App. 3d at 461. In doing so we have found no bases in the record to support respondent's contentions that he was thwarted in his efforts by the caseworkers and others assigned to him. In Re Drescher, 91 Ill. App. 3d 658, 665 (1980)

The order of the circuit court of Cook County dismissing the State's supplemental petitions is therefore reversed, ad the cause is remanded for further proceedings.

Reversed and remanded.

CAMPELL, P.J., with O'BRIEN, J., and GALLAGHER, J., concurring.

C75

Information For Parents About the
PARENTING ASSESSMENT TEAM

A Project of Thresholds Motheer Project
and the
University of Illinois- department of psychiatry

INRODUCTION

Your DCFS caseworker has referred your family's case to the Parenting Assessment Team.

This team looks at families in which mental illness may have affected the way parents care for their children.

Families who agree to participate in the assessment by this team have the benefit of a complete review of their case by an impartial team. This team does not make decisions about custody. IT simply collects information to help in answering questions about what the parent can and cannot do, and about what might help improve parenting problems. This information is placed in a report for the DCFS caseworker, and Juvenile Court if needed.

This report should help the worker to develop the best possible service plan for your family.

The Parenting Assessment Team
Thresholds Psychiatric Rehabilitation Center
2700 North Lawrence Avenue
Chicago, Illinois 60614

UIC The university of Illinois of Chicago

C84-C85

Community Counseling Centers of Chicago
Anthony A. Kopera, Ph. D.
President & Chief Executive

March 24,1997

To whom it may concern;

I am writing on behalf and at the request of Eugene Joneson. I have been his psychotherapist since July 1995. I have been working with him primarily on issues related to the foster care of his daughters. Mr. Joneson has recently told me that a previous psychiatric evaluation diagnosed him with a severe personality disorder. This, he relates, has been the reason he is not being more strongly considered as an adequate parent. I do not believe that this is reasonable.

Although it is clear that Mr. Joneson has some personalty issues to work on, as we all do, I do not see him as having a severe personality disorder. In fact neither did our consulting psychiatrist and medical director when she evaluated him last year.

It is important to note that I have spent roughly forty more hours with Mr. Joneson than the evaluator who, Mr. Joneson relates, spent only one hour with him. I feel strongly that he has been able to do an excellent -job- improving himself and I see no reason that he shouldn't be considered as adequate parent.

Mr. Joneson has applied himself to the therapy process with openness and diligence, and I have rarely seen a parent with DCFS involvement mor willing to take the court's recommendations seriously, and to directly and honestly confront issues brought to his attention by the Catholic Charities workers.

Please consider this information, and give this nice gentleman all the consideration you find appropriate.

Sincerely, s/g T Harrison Supervisor
Todd Harrison LCSW Adult Out-patient Program

C90

Alan Childs, M.A. Psy. D.P.C.
Clinical psychologist
10415 Roberts Road
Palos Hills, Ill. 60454

Mailing Address
5920 Sauganash Lane
Chicago Ill. 60646

Telephone
708/422/2772

PSYCHOLOGICAL EVALUATION

Patient Name:	Eugene Joneson
Chronological Age	44 years
Date of Birth:	2/5/53
Date of Evaluation	6/20/97 & 6/23/972

Summary

Mr. Joneson was referred for a psychological evaluation to provide an assessment of his intellectual and emotional functioning. On presented IO measures, he achieved a Verbal IQ score within the Average range, while his Performance IQ score fell within the Very Superior range. This is an improvement over his earlier 1995 evaluation. He worked quickly and efficiently on timed tasks and was able to focus adequately over the course of the evaluation. Thus, intellectual functioning is intact.

However, he does have a concrete thinking style and presents as anxious, with a sense of urgency, regarding his ongoing court case. He does not want parental rights terminated and is preoccupied with thoughts regarding his children. He also appears sensitive to their needs with regard to the ongoing court process as well.

Mr. Joneson presented as good natured, but overly spontaneous in his speaking style, demonstrating verbal disinhibition. As noted, he had some difficulty organizing his thought processes, particularly during unstructured measures.

Diagnostically, *he meets the criteria for Alcohol* Dependence in Remission. During the current evaluation, he did meet the diagnostic criteria for a Personality Disorder. He is functioning well, working regularly, maintaining sobriety, and interested in social interactions with others. Thus, while his style was somewhat circumstantial and he did over-elaborate when speaking, he does not meet the criteria for schizotypal Personality Disorder, though he may manifest Schizotypal Personality traits. This diagnosis is consistent with Dr. Childers, Medical Director of the agency where he is currently receiving psychotherapy.

The above is found in Vol 7 of 9, R153 starting at Summary

R153

Family Interventions: Psychotherapy and Mediation
55 E. Washington, Suite 1410
John Lietzau, L.C.P.C. Chicago, Il. 60602-2109
Phone 312-551-1419
e mail: jklietzau

Re: Mr. Gene Joneson April 23,1998

Mr. Joneson has been in treatment with this therapist since February 11, !998. He has been seen for a total of 16 hours, including a Fathering Workshop he willingly attended at my request.

Mr. Joneson had been seeing Todd Harrison since 1995, for approximately 60 sessions. The reasons for his long therapeutic involvement are clear and justifiable. Mr. Joneson has been fighting for custody of his children in a system that appears to have already made up its mind that he has lost his case before all of his legal options have been exercised. Mr. Joneson is adopted himself so he doesn't have anything against someone being adopted. He has recently lost his case in Juvenile Court but has filed an appeal.

The issue is Mr. Joneson's allege personality disorder that SIMPLY DOES NOT EXIST according to Mr. Harrison (LCSW) and myself (LCPC). We have data from psychological testing to back up our assessments.

Additionally, this therapist, who is an adult adoptee and a recent adoptive parent (9 year old girl) through Catholic Charities and DCFS, has seldom seen a Father work harder to maintain contact with his daughters.

When my adopted daughter was my foster child, her birth mother stopped attending visitations for two years before we could adopt this girl. In addition, a thorough search was conducted at taxpayer expense before the birth mother's parental rights were terminated and the adoption went through.

It is criminal that a Father shows up for supervised visits,

studies parenting books. Pays for Psychological treatment and is still on the verge of losing his visitation rights.

" s/g J. Lietzau"
John Lietzau, LCPC

C94

The above is found in Vol 1 of 2. 1/8/99, C 94

NO TRAINING IN EVALUATING PARENTS FOR PARENTING SKILLS FOR KATHY PESEK COORDINATOR OF PARENTING ASSESSMENT TEAM Vol 4 of 6, C 98 ln 20-C99 ln7

Q. Did you have any degrees or any training in evaluating the parents for parenting skills?
A. Since I have been working with this team : yes,
Q So, all of the experience you have in evaluating parents or family skills has come through the assessment team?
A. Yes
Q. Did you have any training prior to that?
A. In assessing parents?
Q. Yes
A. No I work mostly with children and families.

C99

JULIE YALOWITZ HAD NO SPECIALIZED TRAINING IN ANALYZING PARENTS FOR PARENTING SKILLS.
Vol 3 of 6, R 72 ln5-22 or Vol 1 of 2, C 108 ln5-22

Q. And Catholic Charities never gave you any type of training class on dealing with parenting skills or helping parents to develop their parenting skills?
A If I don't have a full training process, no
Q. So then how is it that you know what's appropriate parenting skills to visit with a child?

A.. There are certain things that are that I fell are instinctual from myself that I feel that are appropriate parenting skills such as the safety of children over time and reading various documents. I have learned from, necessarily then or more appropriate interactions and how to judge that.
Q. So then you got involved. All of information on your own, you have not had any specific training?
A. I have had on ongoing supervision.

C108

Vol 3 of 6 R 70, ln 10-R7 ln 11
Q. Okay, And did you have any specific training with Catholic Charities for dealing with parenting issues with parents?
A. Not from Catholic Charities. That' basically my education.
Q. What do you mean the basis of your education?
A. My minor, my major in college was with child development and human behavior, and my masters degree in social work with a concentration in child and family interaction.
Q. Okay. That was your major in college, but did your major in college direct you on how to assess parenting skills, observe interactions between parents and children in a visitation setting?

C70

A. Also, the focus of my masters in social work was on child development and child welfare and family interaction. Did I receive a specific parenting classes? No, I'm not sure what you're asking.
Q. Did you have specific training for dealing with parenting skills of parents and those interactions with children? That's what I'm saying and trying to figure out.
A I did not attend a specific training session geared toward that, no.

C71

Louis A. Weiss memorial hospital
Chicago, Illinois

This certifies *That Luella Elizabeth Joneson was born t Mr. & Mrs. Eugene Herman Joneson in this Hospital at 11:15 o'clock, A.M. on Sunday the 30th day of January 1924 In witness Whereof the said Hospital has caused this Certificate to be signed by its duly authorized officer, and its Official Seal to be hereunto affixed*

S/g Dea M Haines
Administrator

C112

2/8/94

I Eugene Joneson have an apartment at

900 W. Argyle Apt 303

Chicago, Illinois 60640

and have resided there since November 1990. Frances O'Neill has been living with me since January of 1993 because she became homeless and I did not want her to be on the street. She became pregnant during this time and has resided with me since. She gave birth to Luella Elizabeth Joneson on January 30th, 1994 at Approx. 11:15 A.M.

She was brought to Weiss Memorial Hospital after in-home delivery with my help. There she was tested for hemorrhaging, and baby was tested for blood type because Mother was RH negative and may have needed RHO-gram shot. They were discharged within one day and returned home with me. I have provided food for both and all necessities for baby, medical prescription, etc/ She has agreed to stay home for 2 weeks. She has experienced severe depressions before and after delivery, due to pain and hormonal changes as far as I can believe. Hopefully due to my realization and experience through previous pregnancies I can prevent this from happening. She seems to be thinking and acting more rationally than in the past. She has been threatening to leave in the next couple of weeks when she gets her money from probate, (mother's death)

I believe that she is mentally stable to care for children and baby, given proper supervision and understanding

s/g Eugene Joneson

2/8/094 .

C140

State of Illinois
County of Cook

In The Circuit Court of Cook County, Illinois
. . . Department of Juvenile Justice and Child Protection
Child Protection Division

In Re The Petition of	)	No. 94JA 1107
Adjudication of Wardship of	)	
Luella Joneson	)	Filed
Minor	)	99 May 26 AM 11:30
		Circuit Court of Cook
		County, Il
		Juvenile Division
		Aurellia Pucinski, Clerk

Notice of Motion

To:

On 6/22, 1998 at 11;00 A.M., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Mulhern, or any judge sitting in her stead, in calendar number 4k in the Juvenile Court Building, 2245 West Ogden, Chicago, Il. 60612, or the courthouse located at 1100 S. Hamilton and present the attached pleading requesting: Motion to add missed documentation or suppiement

Attorney Signature "s/g Eugene Joneson , Pro Se, 2043 W. Dickens, Chicago, Illinois 60647, 773-645-9695.

C226

Vol. 1 of 2, January 8th, 1999. Appellate Record C 190

Hon. Roberto Maldonado
Commissioner
District 8

Cook County Board of Commissioners
Chicago, Illinois 60602

May 14, 1998

To whom it may concern:

I certify that on May 7, 1998, at approximately 4;57 p. m., I placed a call to 312 666-3488, known as Erie Family Health Center to speak to Ms. Eva Hernandez, an employee of Erie Family Health Center. NI asked her a question on behalf of Mr. Eugene Joneson. I asked Ms. Hernandez, "Did Mr. Joneson ever attend Parenting classes at Erie Family Health Center?" Her response was that she could not anser that question because those records were purged or destroyed after five years. But she could state with certainty that Erie Family Health Center has never offered Parenting classes. They have never had such a program.

She also stated that Mr. Joneson did receive other services from the agency, but they could not have been parenting classes because no such program existed.

She also stated the Mr. Joneson did receive other services from the agency, but they could not have been parenting classes because no such program existed.

Sincerely,

"S/ David Del Devalle"

David Del Valle
Administrative Aide V/Chief of Staff
115 North Clark Street
Room 567
Chicago, Illinois 60602

District Office
2617 W. Division St.
Chicago, Illinois 60622

C227

HECTOR RIVERA'S TESTIMONY PARENTING CLASSES BEING TAKEN AT ERIE FAMILY HEALTH CENTER

Vol 1 of 2, January 8th, 1999. Appellate Common Record C191-192 ln 8-192 ln16, 194 ln22-196 ln9 or Vol 1 of 6, R , R 206 207),(Vol 1 of 6, R228 ln13- R229 ln4)

Vol 1 of 2, January 8th, 1999. C191 ln 8-22 or Vol 1 of 6, R 186 ln 8-21

Q. Do you recall how you evaluated the parenting skills requirements under the service plan?

A According to the case review, actually, there is no check as to satisfactory or unsatisfactory. Because we were awaiting a report from the parental skills group .

Q. Were was father to receive the parental services parenting skill class training?

A During the service plan, he was to go to Erie Family Mental Health Center.

The court: Did you say Erie?

The Witness: yes.

NO CONTACT WITH ERIE ABOUT SERVICES TO BE OFFERED

Vol 1 of 2, January 8th, 1999.C194 ln22-196 ln9 or Vol 1 of 6, R206 ln22-208 ln8)

Q. From the time of June of 1988 to October of '88, do you remember where— what parenting skills program the father was to attend?

A. Erie Family Health center

Q. In June of 1988, who was the Erie Family Mental Health worker who was assigned to the case of the O'Neill children and Mr. Joneson specifically?

A. There were two people who I know that worked in that program. It was Eva Hernandez and Dr. Strongin.

C191

Q. And when you took over this case in 1988, June of 1988, did you have a meeting with Dr. Strongin about Mr. Joneson?

A. No, I did not.

Q, Did you have a meeting with Miss Hernandez about my client's progress in June of 1988?

A. No, I did not.

Q. Between the time of June of 1988 and a October of 1988, did you have a meeting with Miss Hernandez or Dr. Strongin?

A. No, I did not

Q. Now, besides the parenting skills program at Erie Family Mental Health Center and the visitation that my client was to receive — let me strike that.

The basis for the referral to the parenting skills program was in order to develop–to educate my client as to what would be proper— what you would consider proper behavior for disciplining his children?

A. Yes

Q. And proper nutrition for his children?

A. Yes

Q. And proper limitation setting for his children?

A. yes

NO OTHER REFERRALS BESIDES ERIE FAMILY
Vol 1 of 6, R228, ln 7-R229 ln4)

Q. And you stated that— you made these same observations that there were these limitation setting problems in October of '88, isn't that correct, that you observed these same kind of limitation setting problems?

A. That's what I wrote down.

R228

Q. So from roughly— and it was you opinion— or was it your belief that these types of problems would be resolved in parenting skill classes at Erie Family Mental Health Center?

A. Not solely

Q. Where else besides Erie Family Mental Health Center did you refer my client for parenting skills classes?

A. I'm talking about as a whole, all the services as a whole.

Q. For parenting skills classes, where besides Erie Family Mental Health Center did you make a referral for my client to go?

A. For parenting classes?

Q. For parenting classes.

A. No other services

R229

(Voi 1 of 6, R234, ln 20-R235 ln4) HECTOR RIVERA THE ONLY PERSON TO MAKE REFERRALS

Q But for the allocation of resources or referrals to parenting skills programs, was there any other worker besides yourself who made referrals to my client?

A. No..

Q. So in effect you were the only person to make referrals for parenting skills classes during that period of time, isn't that correct?

A. yes.

R234

State of Illinois
County of Cook

In The Circuit Court of Cook County, Illinois
. . . Department of Juvenile Justice and Child Protection
Child Protection Division

In Re The Petition of) No. 94JA 1107
Adjudication of Wardship of)
Luella Joneson)
Minor)

Filed
98 Jun 18 PM 4;18
Circuit Court of Cook
County, Il
Juvenile Division
Aurellia Pucinski, Clerk

Notice of Motion

To:

On 4/7, 1998 at 9:00 A.M., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Mulhern, or any judge sitting in her stead, in calendar number 4k in the Juvenile Court Building, 2245 West Ogden, Chicago, Il. 60612, or the courthouse located at 1100 S. Hamilton and present the attached pleading requesting: Motion for letters to be allowed to be written to girls without being opened and read by caseworker before delivery and also to include the topic of adoption.

Attorney Signature "s/g Eugene Joneson , Pro Se, 2043 W. Dickens, Chicago, Illinois 60647, 773-645-9695.

NO SERVICE PLANS FROM MAY 7TH, 1991 TO FEBRUARY 2ND, 1994 Vol 1 of 2, clerk stamp C101
Table of Contents of Record of Appeal

Client service Plan- May 7, 1991	C-122
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Client Service Plan-October 10, 1990	C-135
Client Service Plan -May 7th , 1991	C-142
Client Service Plan February 2nd, 1994	C -159
Client Service Plan- August 10, 1994	C-161
Client Service Plan- November 7, 1994	C-167

Illinois Department of Children and Family Services
Child Summary

Date of Plan 11/7/94

Child's Name Luella Joneson Child's I.D.: T499-86-05

Name of Placement: Mario and Ann Villanueva
Address: Catholic Charities, 651 W. Lake, Chicago, Illinois, 60661
Placement Checklist

Y	N	N/A	
X			Is the child placed in the least restrictive setting most approximating a family which meets the child's needs?
	X		Are siblings placed together?
X			Is the child placed within reasonable proximity to home?
X			In a home of similar ethnic and cultural background?
X			In a home with the same religion?
	X		Is the child placed with relatives?

Explain all "no" answers. In addition, if the child is in an institution or group home setting, please explain why and indicate how long the child will remain there.
A. No appropriate relative home could be found at the time Luella came into care.

Found in Vol 1 of 9,C88